

REMARKS

Claims 1 and 14 have been amended. Proper support for the amendment to claims 1 and 14 can be found in the specification, at least at paragraph [0028]. Claim 15 has been cancelled without prejudice or disclaimer. Claims 1-14 and 16-24 are pending and under consideration. No new matter is presented in this Amendment. Claims 1 and 14 are the independent claims.

REJECTIONS UNDER 35 U.S.C. §102:

Claims 1-3, 5-6, 9-14, and 16-20 are rejected under 35 U.S.C. §102(a) as being anticipated by Kim et al. (U.S. Patent Application Publication No. 2003/0012558).

Applicants respectfully traverse this rejection for at least the following reasons.

Regarding the rejection of independent claim 1, it is noted that claim 1 recites a reproducing apparatus comprising: an audio visual (AV) reproducing engine which decodes AV data; an enhanced audio visual (ENAV) engine, which includes player language information selecting one among a plurality of ENAV applications, each of which includes substantially similar contents and is made with a different language from the other ENAV applications, and interprets and executes the selected ENAV application with reference to the player language information in order to reproduce the AV data in an interactive mode; and a reader which reads the selected ENAV application corresponding to the player language information, based on language information of the ENAV application recorded on a startup file of an information storage medium read by the reproducing apparatus, wherein the ENAV engine buffers the ENAV application before the AV data is reproduced in the interactive mode.

Kim discloses in FIG. 1 a reproducing apparatus including a reader 1, a buffer memory 2, a cache memory 3, an AV decoder 4, a presentation engine 5 and an AV blender 6 (paragraph [0042]). The Office Action relies on the presentation engine 5 for a teaching of the ENAV engine of independent claim 1. However, independent claim 1, as amended, recites that the ENAV engine buffers the ENAV application before the AV data is reproduced in the interactive mode. In the instant case, Kim does not teach that the presentation engine buffers the ENAV application. Kim simply discloses that the buffer memory 2 buffers the AV data read by the reader 1 and the cache memory 3 caches the markup document read by the reader 1. Kim

further discloses that the AV decoder 4 decodes the AV data buffered in the buffer memory 2 and outputs the AV data stream and the presentation engine 5 interprets the read markup document and identifies the location of the display window. Kim finally discloses that the AV blender 6 displays the markup document outputted by the presentation engine 5 and the AV data stream outputted by the AV decoder 4 in the display window.

Accordingly, Kim discloses that the buffer memory 2 buffers the AV data and the cache memory 3 caches the markup document. Therefore, the presentation engine (ENAV engine) does not cache the markup document (buffer ENAV application), as recited in independent claim 1.

Furthermore, it is noted that claim 1 also recites that the ENAV engine buffers the ENAV application before the AV data is reproduced in the interactive mode. Kim does not disclose anything about buffering the ENAV application before the AV data is reproduced, at most Kim discloses that both, AV data and ENAV data, are buffered and cached, but does not teach or suggest in what order they are buffered and cached, or whether one is done before the other (paragraph [0045]).

Additionally, it is noted that the Office Action states that Kim discloses that language information of the ENAV application is recorded on a startup file. Applicants respectfully traverse this characterization for at least the following reason. As noted above, Kim discloses that if the DVD is inserted into the reproducing apparatus, the presentation engine retrieves the language information contained in the file VIDEO\_TS.IFO and determines whether a language designated as the first default value of the reproducing apparatus exists in the language information. If the language information contained in the file VIDEO\_TS.IFO of the DVD does not have the language designated as the first default value of the reproducing apparatus, the presentation engine sets the language designated as the second default value of the file VIDEO\_TS.IFO or DVD\_ENAV.IFO of the DVD as the first default value for the reproduction of the markup document. Accordingly, Kim discloses retrieving the language information contained in a video file and if the language information is not in the video file, then Kim discloses retrieving the language information from another video file or the ENAV file.

As noted above, claim 1 recites a reader reading the one ENAV application corresponding to the player language information, based on language information of the ENAV application recorded on a startup file of the information storage medium read by the reproducing apparatus. That is, the language information is retrieved from the ENAV file at the startup and

not after searching the video files. Accordingly, Kim also fails to teach or suggest this novel feature of independent claim 1.

Accordingly, Applicants respectfully assert that the rejection of claim 1 under 35 U.S.C. § 102(a) should be withdrawn because Kim fails to teach or suggest each feature of independent claim 1.

Regarding the rejection of independent claim 14, it is noted that this claim recites some substantially similar features as claim 1. Thus, the rejection of this claim is also traversed for the reasons set forth above.

Furthermore, Applicants respectfully assert that the rejection of dependent claims 2, 3, 5, 6, 9-13 and 16-20 under 35 U.S.C. §102(a) should be withdrawn at least because of their dependency from claims 1 and 14 and the reasons set forth above, and because the dependent claims include additional features which are not taught or suggested by the prior art. Therefore, it is respectfully submitted that claims 2, 3, 5, 6, 9-13 and 16-20 also distinguish over the prior art.

**REJECTION UNDER 35 U.S.C. §103:**

Claims 4, 7-8, and 21-23 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kim et al. (U.S. Patent Application Publication No. 2003/0012558) as applied to claims 1-3, 5-6, 9-14, and 16-20 above, further in view of Lamkin et al. (U.S. Patent No. 7,178,106).

Initially it is noted that claims 4, 7-8 and claims 21-23 depend from independent claim 1 and 14, respectively, and as noted above, Kim fails to teach or suggest the novel features of independent claims 1 and 14.

Lamkin on the other hand is relied upon solely for a teaching of a system parameter. However, Lamkin does not teach or suggest any of the novel features of the independent claims. Lamkin simply discloses an application programming interface (API) for integrating locally stored media content and remote interactively-obtained network media content, e.g., video content on a web page (column 4, lines 40-50). Accordingly, Lamkin fails to cure the deficiencies of Kim.

Therefore, applicants respectfully assert that the combination of Kim and Lamkin does not disclose or suggest the features of independent claims 1 and 14. Thus, the rejection of dependent claims 4, 7-8 and 21-23 is traversed, at least because of their dependency from claims 1 and 14.

Claim 15 is rejected under 35 U.S.C. §103(a) as being unpatentable over Kim et al. (U.S. Patent Application Publication No. 2003/0012558) as applied to claims 1-3, 5-6, 9-14, and 16-20 above, and further in view of Yamane et al. (U.S. Patent No. 5,784,528).

Claim 15 has been cancelled without prejudice or disclaimer. Accordingly, the rejection of claim 15 is moot.

Claim 24 is rejected under 35 U.S.C. §103(a) as being unpatentable over Kim et al. (U.S. Patent Application Publication No. 2003/0012558) as applied to claims 1-3, 5-6, 9-14 and 16-20 above, and further in view of Horiguchi et al. (U.S. Patent No. 6,370,322) and Winter et al. (U.S. Patent Application Publication No. 2004/0076405).

Initially it is noted that claim 24 depends from independent claim 14, and as noted above, Kim fails to teach or suggest the novel features of independent claim 14.

Furthermore the Office Action states that Kim discloses that the ENAV data is selected automatically based on the SPRM and relies on paragraphs 0020 -0022, 0024, 0026 and 0062 for such teachings. However, a careful review of these paragraphs simply indicates that Kim discloses receiving language information by using language mapping information, but fails to teach or suggest anything related to automatically selecting ENAV data based on the SPRM, as alleged in the Office Action. Accordingly, it is respectfully noted that Kim fails to teach or suggest this novel feature.

Horiguchi on the other hand is relied upon solely for a teaching of an SPRM table entry, but fails to teach or suggest the novel features of independent claim 14. At most Horiguchi discloses a data decoding system in which the system parameter of the devices forming the system for decoding the data transmitted through a digital interface is maintained always the same in all devices (paragraph 1, column 9-17). Accordingly, Horiguchi fails to cure the deficiencies of Kim.

Winter is relied upon solely for a teaching of a reserved area to store language code, but Winter fails to teach or suggest the novel features of independent claim 14. At most Winter discloses a method of organizing sub-picture data in sub-picture units (SPU), the sub-picture units comprising pixel data in a pixel data area (PXD) as well as display control data and/or address information data, wherein a sub-picture unit of a second sub-picture stream is inserted

into the pixel data area of a sub-picture unit of a first sub-picture stream (paragraph 0001). Therefore, Winter also fails to cure the deficiencies of Kim and Horiguchi.

Accordingly, Applicants respectfully assert that the rejection of claim 24 under 35 U.S.C. §103(a) should be withdrawn because neither Kim, Horiguchi nor Winter, whether taken singly or combined, teach or suggest each feature of independent claim 14 upon which claim 24 depends.

**CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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